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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

TRAVIS BATTEN,

Plaintiff,

v.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY; ILLINOIS NATIONAL  
INSURANCE COMPANY and COUNTRY  
PREFERRED INSURANCE COMPANY,

Defendants.

NO.

NOTICE OF REMOVAL UNDER  
28 USC § 1441(b) (DIVERSITY)

**(Clerk's Action Required)**

TO: ALL PARTIES HEREIN AND TO THEIR RESPECTIVE  
COUNSEL OF RECORD

AND TO: THE CLERK OF THE ABOVE-ENTITLED COURT

PLEASE TAKE NOTICE that defendant Illinois National Insurance Company  
("Defendant" or "Illinois National") hereby removes to this Court the state court action described  
below.

1. On March 15, 2018, named plaintiff Travis Batten commenced an action in the Circuit Court of the State of Oregon, County of Multnomah, entitled *Travis Batten v. State Farm Mutual Automobile Insurance Company; Illinois National Insurance Company and Country Preferred Insurance Company*, Case No. 18CV10107.

2. Plaintiff Travis Batten (“Plaintiff” or “Batten”) served his Summons and Complaint from the Circuit Court on Defendants Illinois National, State Farm Mutual Automobile Insurance Company (“State Farm”) and Country Preferred Insurance Company (“Country Preferred”) (collectively referred to as “Defendants”) on March 20, 2018. A true and correct copy of the Summons, Complaint, and all other documents filed with the Circuit Court to this date, are attached as Exhibits A through H to the Declaration of Donald J. Verfurth in Support of Notice of Removal, filed herewith.

3. Based on information and belief, complete diversity of citizenship exists.

4. Based on information and belief, Plaintiff is an Oregon citizen.

5. Defendant Illinois National is an Illinois corporation, with its principal place of business in New York, New York.

6. Based on information and belief, Defendant State Farm is an Alabama corporation, with its principal place of business in Bloomington, Illinois.

7. Based on information and belief, Defendant Country Preferred is an Arkansas corporation, with its principal place of business in Little Rock, Arkansas.

8. According to his Complaint, Plaintiff’s claimed damages exceed \$75,000.

9. This is a civil action over which this Court has original jurisdiction under 28 U.S.C § 1332, and is one that may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C. § 1441 in that it is a civil action between citizens of different states and

the matter and controversy exceeds the sum of \$75,000, exclusive of interest and costs. Under 28 U.S.C. § 1441 (a), the case should be removed “to the district court of the United States for the district and division embracing the place where such action is pending.” Here, removal is made to this Court because the underlying case was filed in Multnomah County Oregon Circuit Court and the Portland Division is the appropriate Division of the District Court of Oregon for matters from Multnomah County.

10. The exhibits attached as Exhibits A through H to the Declaration of Donald J. Verfurth in Support of Notice of Removal constitute all of the process and pleadings in the Multnomah County Circuit Court action to date.

11. In accordance with 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being filed with the Multnomah County Circuit Court, Oregon, and notice is being given to the adverse party.

Dated: April 19, 2018.

GORDON REES SCULLY  
MANSUKHANI, LLP

By: /s/ Donald J. Verfurth  
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Attorney For: Defendant Illinois National  
Insurance Company

DECLARATION OF SERVICE

I hereby declare, under penalty of perjury under the laws of Washington and Oregon, that on April 19, 2018, I filed the foregoing using the Court's ECF filing system and also served a copy of the foregoing via Federal Express, overnight delivery, on the following parties:

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